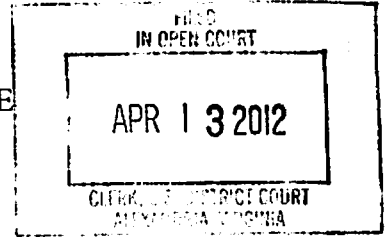


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

JOHN C. KIRIAKOU,

Defendant.

Criminal No. 1:12CR127 (LMB)

PROTECTIVE ORDER

PROTECTIVE ORDER FOR UNCLASSIFIED INFORMATION

THIS MATTER COMING BEFORE THIS COURT on the agreement of the parties for entry of a protective order concerning the disclosure of certain materials exchanged between the parties in this matter, in consideration of the sensitive nature of the information which may be disclosed in accordance with the Discovery Order entered in this case on or about April 13, 2012 and other discovery obligations of the parties as provided by law,

Accordingly, it is ORDERED:

1. All Protected Material exchanged between the parties will be handled in accordance with the terms of this Protective Order. The term "Protected Material" shall be defined for purposes of this order as (A) the following material known to the United States: (i) FBI 302s and other memoranda of interview, (ii) Jencks Act witness statements, (iii) grand jury transcripts; (iv) Rule 16 discovery; (v) *Brady/Giglio* information; and (B) the following material known to the defendant: (i) Rule 16 discovery, and (ii) reverse Jencks Act witness statements.

2. Protected Material provided by the United States to the defendant shall be reviewed only by defendant, his attorneys of record, employees of such attorneys to whom it is necessary that

the materials be shown for the purposes of preparation, trial, and appeal of this matter, witnesses or potential witnesses and their counsel, and experts or consultants assisting in the preparation, trial and appeal of this matter. No additional copies of such materials shall be made except as necessary for the preparation, trial and appeal of this matter. Such witnesses, counsel, experts or consultants to whom Protected Material is disclosed must be served with a copy of this Protective Order prior to disclosures of Protected Material to them.

3. The same conditions and restrictions apply to Protected Material provided by the defendant to the United States. It is understood that among the persons to whom the government will need to disclose certain Protected Material are law enforcement agents engaged in the preparation for trial or hearings in this case, witnesses and potential witnesses, and representatives of the CIA.

4. Protected Material disclosed by the parties shall be used solely for the preparation, trial and direct appeal of this matter and for no other purpose whatsoever. The contents of the Protected Material disclosed to the defendant or by the defendant shall not be disclosed to any other individual or entity in any manner except to a photocopy service as agreed by the parties or by further order of this Court except as provided.

5. Nothing in this Protective Order limits the defendant or the United States from disclosing Protected Material in this or related judicial proceedings, including motions, hearings, trial, or appeal.

6. The Court and the parties understand that this Protective Order does not apply to classified materials, and that the handling and protection of classified materials must be addressed separately pursuant to the Classified Information Procedures Act (CIPA).

Entered in Alexandria, Virginia, this 13<sup>th</sup> day of April, 2012.

*/s/ LMB*  
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Leonie M. Brinkema  
United States District Judge